

EXHIBIT GG



The Kroger Family of Companies

Animal Welfare Policy

Introduction

Animal welfare is an important issue to Kroger, our customers and our associates. We have a long-standing commitment to responsible business practices, including the humane treatment of animals. Our commitment, leadership and results with respect to animal welfare matters are well established and recognized within the industry.

Scope

Kroger is not directly involved in raising or the processing of any animals. We do, however, require our suppliers to adopt industry-accepted animal welfare standards that we endorse, and we monitor our suppliers for compliance with these standards.

Alignment

We align with the Food Marketing Institute's (FMI) industry-adopted and industry-aligned animal welfare standards for the following animal proteins and require *Our Brands* suppliers to meet or exceed these standards:

- Beef: North American Meat Institute; National Cattlemen's Beef Association
- Pork: National Pork Board
- Chicken: National Chicken Council
- Turkey: National Turkey Federation
- Eggs: United Egg Producers

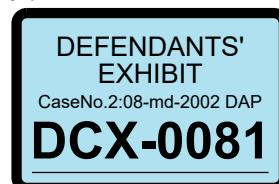
We align with the industry-adopted National Dairy FARM Program: Farmers Assuring Responsible Management™ program to ensure animal welfare in our dairy supply chain.

Commitments and Practices

We recognize that best practices for animal husbandry continue to evolve based on research and industry standards. As a result, we continue to work with the vendor community to evaluate emerging and evolving topics, and to adopt new practices. Below, we outline our commitments and practices on relevant animal welfare topics. We will share updates on our commitments in our annual sustainability report.

Cage-free eggs

As our customer base has been changing to prefer cage-free eggs, Kroger has been sure to provide this as an option. We realize the importance of animal welfare in our supply chains and as a result, we established a goal to transition to a 100% cage-free egg supply chain by 2025. Kroger's family of stores is committed to working with our suppliers during this transition in a way that ensures eggs are readily available, safely produced and affordably priced for all our customers.



Last updated: June 2019

DCX-0081-0001

Gestation crate-free sow environments

We recognize that sows in the pork industry may experience negative health and behavioral impacts when housed in gestation stalls (also known as gestation crates) during pregnancy, and that group housing is a viable alternative. As a result, Kroger began asking our suppliers to transition away from gestation stalls to group housing or free-range environments. Many of our pork suppliers are already making this transition or have time-bound commitments to make this transition. By 2025, Kroger will source 100% of fresh pork from suppliers and farms that have transitioned away from gestation stalls.

Dairy cow welfare

Kroger requires that 100% of all domestic milk and dairy product suppliers that supply our dairy processing plants and *Our Brands* grocery assortment are enrolled in The National Dairy FARM Program: Farmers Assuring Responsible Management™, which provides consistency and uniformity of best practices in animal care and quality assurance in the dairy industry.

Polled dairy cows

Kroger recognizes the value of polled genetics for reducing the need for dehorning and disbudding in dairy cows and supports a transition to polled cows in a manner that is prudent. Currently, the population of polled dairy cows is very small. While this number is certainly increasing, any significant change in herd genetics should be pursued deliberately and slowly to avoid unintended negative consequences that may affect the cow's welfare and milk production. Our dairy experts and animal welfare specialists counsel us that in time, there will be more hornless dairy animals available to breed, but that it is a longer-term process. In the meantime, we support the proper pain management protocols recommended by The National Dairy FARM Program: Farmers Assuring Responsible Management.

Antibiotic-free meats

Kroger is a recognized industry leader with our offerings of antibiotic-free meats. In addition to several national brands, our Simple Truth® line of meat products is available in stores and is entirely free from antibiotics and growth hormones.

Plant-Based Proteins

We are committed to offering our customers a wide range of choices when it comes to protein, including plant-based options.

Audits

Kroger requires all beef, pork, chicken, turkey and egg suppliers to provide evidence of an annual Animal Welfare audit to Kroger, as part of doing business with us. Audits are to align with our accepted animal welfare standards and are to be conducted by reputable independent commercial third-party auditing companies. We require that all milk and dairy product suppliers who supply our dairy processing plants and *Our Brands* grocery assortment to be enrolled in the National Dairy FARM Program: Farmers Assuring Responsible Management™ program for animal welfare. We also require that every farm that supplies Kroger have completed at least one FARM Program audit.

Implementation Approach

We use several means to maintain our commitment to animal welfare.

- We set responsible sourcing commitments that will drive change within our own business and contribute to positive change in our supply chain.
- Kroger engages regularly with suppliers to communicate our requirements, ensure they are meeting them and collaborate on continuous improvement opportunities.
- We convene an independent panel of animal science experts to make recommendations on how we can work with the industry to improve animal welfare.
- We participate in industry and trade organizations to ensure Kroger stays aware of relevant trends and contributes to industry-wide initiatives on these topics.
- Kroger shares information about our strategy, commitments and approach with relevant stakeholders.
- We provide leadership and actively participate in discussions on this important topic within the retail grocery industry.

Last updated: June 2019